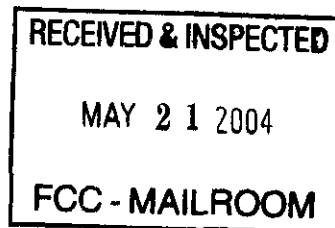




DOCKET FILE COPY ORIGINAL



March 8, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Board of Directors

Susan Galbraith
Aunie T. Hall
Sandra Cohen Kalter
Judge Gladys Kessler
Mary Ann Luby
Olinda Moyd
Tom Petersik
Gwen Rubinstein
Nemat Shafik
Brenda V. Smith
Jonathan Smith
Robin Smith

Re: Petition for Rulemaking by Martha Wright, et al.,
from Wright v. Corrections Corporation of America,
CA No. 00-293 (GK)(D.D.C.)

Dear Ms. Dortch:

Enclosed are an original and four copies of Comments to the above mentioned Petition for Rulemaking. Our Place DC and Hope House joins The Journey Ahead Enterprises, Thoughts of the Spirits Ministry, Vistor's Services Center and the Washington Legal Clinic for the Homeless in supporting the Petition and requesting for the Commission to implement a competitive inmate calling policy.

Please feel free to contact me at 202-548-2400 if you have any questions

Very Truly Yours,

April M. Giancola
Director of Legal Services*

Enclosures

Cc: Deena Shelter
Joi Nolen
Deborah M. Golden
Stephen G. Seliger
Laurie S. Elkin
Barbara J. Olshanksy
Charles Kennedy
Frank W. Krogh

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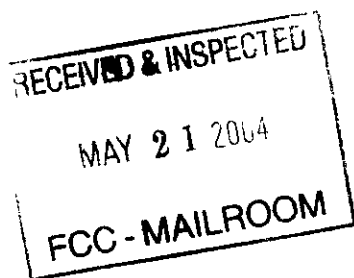
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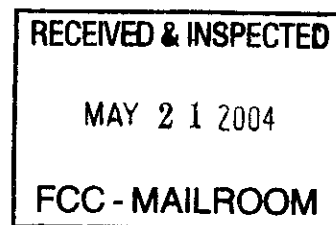
United Way
of the
District of Columbia

Jennifer Kostyu
Tracey Tucker
Susan Galbraith
Carol Fennely
Prophetess Taji Anderson
Anne Cunningham
Patricia Mullahy Fugere
Qualex International

*Licensed in AZ and MA, DC Pending



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554



In the Matter of:

Implementation of Pay Telephone
Reclassification and Compensation
Provisions of the Telecommunications
Act of 1996

Martha Wright, Dorothy Wade, Annette Wade
Ethel Peoples, Mattie Lucas, Laurie Nelson,
Winston Bliss, Sheila Taylor, Gaffney &
Schember, M Elizabeth Kent, Katharine Goray,
Ulandis Forte, Charles Wade, Earl Peoples,
Darrell Nelson, Melvin Taylor, Jackie Lucas,
Peter Bliss, David Hernandez, Lisa Hernandez
and Vendella F. Oura

Petition for Rulemaking or, in the Alternative,
Petition to Address Referral Issues in Pending
Rulemaking

CC Docket 96-128

COMMENTS OF
OUR PLACE DC, HOPE HOUSE
and OTHER SUPPORTING ORGANIZATIONS

Susan Galbraith
April Giancola
Our Place DC
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Washington, DC 20003
(202) 548-2400

Carol Fennelly
Hope House
PO Box 60682
Washington, DC 20039
(202) 545-9670

Dated: March 8, 2004

In the Matter of.)	
)	
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Implementation of Pay Telephone)	
Reclassification and Compensation)	
Provisions of the Telecommunications)	
Act of 1996)	
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Schember, M Elizabeth Kent, Katharine Goray,)	CC Docket 96-128
Ulandis Forte, Charles Wade, Earl Peoples,)	
Darrell Nelson, Melvin Taylor, Jackie Lucas,)	
Peter Bliss, David Hernandez, Lisa Hernandez)	
and Vendella F. Oura)	
)	
)	
Petition for Rulemaking or, in the Alternative,)	
Petition to Address Referral Issues in Pending)	
Rulemaking)	

These comments are submitted to the Federal Communications Commission (FCC) by Our Place DC, Hope House and other supporting organizations in support of the above-captioned Petition requesting the Commission to require all privately administered prisons to implement a competitive inmate calling policy.

OUR PLACE DC

Our Place DC (Our Place) was founded in 1999 with the goal and vision to provide direct services to District of Columbia women and their families who are incarcerated, and coming out of incarceration. The mission is to support women who are or have been in the criminal justice system with the support and resources they need to maintain connections with the community, resettle after their incarceration, and reconcile

with their families. Our Place helps women remain alcohol and drug free, obtain decent housing and jobs, gain access to education, secure resources for their children, and maintain physical and emotional health. Through the efforts of our dedicated staff and volunteers, we have been able to serve over 1600 women and their families in the past five years, and assist them in preventing re-incarceration in the future.

HOPE HOUSE

Hope House began in 1998 to serve the needs of incarcerated fathers from the District of Columbia and their families. Using innovative programming Hope House enables fathers in prisons far from home to stay connected to their children in the District. Hope House has touched hundreds of families through its programs. Through live video teleconferencing, father and child summer camps behind bars, and a family literacy program, Hope House tries hard to maintain community ties and stable families.

OTHER SUPPORTING ORGANIZATIONS

Journey Ahead Enterprises (Journey Ahead) has an ex-offenders program called The Jeremiah Project. Prophetess Taji Anderson, CEO of Journey Ahead has personal experience with the burden of high collect calls from incarcerated loved ones. She gets calls from her son at \$6.25 for fifteen minutes, and by the time she talks to him four times a week, it costs approximately \$100 a month.

Thoughts of the Spirit Ministry (Thoughts of the Spirit) is a non-profit organization, whose mission is to provide avenues for educational opportunities, information sharing, referrals for needed social services and housing programs,

fellowship activities and open discussion for women in need. They travel to prisons, transitional houses, treatment facilities, and churches, providing services via two components: The Women's Empowerment Group and The Prison Ministry. The Women's Empowerment Group provides classes in anger and stress management, addiction, abuse, self-love and worth, and forgiveness. The Prison Ministry is a ministry for women who are incarcerated. Thoughts of the Spirit recognizes the importance to bridge the gap between women and their families, which can be done via increased and consistent telephone contact with loved ones.

The Visitors' Services Center (VSC) has worked with inmates in the DC Jails for the past 35 years. VSC responds to thousands of inmate requests, many of which revolve around the goal of maintaining strong family ties. VSC used to accept collect calls from inmates, but had to eventually stop the practice because of the exorbitant prices they were charged. Ann Cunningham, Executive Director remembers one month's bill totaling \$4,000. This also becomes a costly burden to non-profit organizations that wish to assist these individuals, but are prevented due to their own budget constraints.

Washington Legal Clinic for the Homeless, Inc. (WLCH), provides free legal services to those who are homeless or at risk of homelessness and works towards system and law reform. Founded in 1986, the WLCH assists individuals to overcome barriers that prevent people struggling with homelessness, or the risk thereof, from accessing the community's traditional legal service programs.

THE FCC SHOULD REQUIRE COMPETITION IN INMATE TELEPHONE SERVICES

We believe successful re-entry for prisoners is most likely to occur if individuals are provided assistance with life sustainable issues such as food, clothing, housing and employment.¹ Additionally, we also must sustain and nurture the relationships that the prisoners have with their families and community outside the prison walls. When policies and procedures are put in place that create barriers to these ends, it often makes it much more difficult to foster successful reentry into the community.

We believe the telephone practices of the Corrections Corporation of America (CCA) and other private prison firms directly prohibit the ability of inmates to create and sustain *crucial relationships with their families*, which in turn results in a negative effect to their recovery and eventual reentry into the community. At least 95% of all State prisoners will be released from prison at some point, and nearly 80% will be released to parole supervision.² As such, the issue of addressing an inmate's ability of successful reentry, and barriers to that end must not be ignored. Research findings highlight the importance of contact among family members during incarceration. Facilitating contact has been shown to reduce the strain and separation and increase the likelihood of successful reunification.³

Our Place specifically addresses this concrete need by providing family trips to the Federal Correctional Institution (FCI) in Danbury, CT, and Hope House provides transportation to Lee County in Southwest Virginia and Edgefield, in South Carolina.

¹ Urban Institute Justice Policy Center. 2001 *From Prison to Home The Dimensions and Consequences of Prisoner Reentry*

² Bureau of Justice Statistics. Criminal offender statistics Retrieved on January 29, 2004 From <http://www.ojp.usdoj.gov/bjs/crimoff.htm>

³ Women's Prison Association 1996. *When a Mother is Arrested How the Criminal Justice System and Child Welfare Systems Can Work Together More Effectively* A Needs Assessment Initiated by the Maryland Department of Human Resources

Once a month families of women and men who are incarcerated are transported to these two prisons overnight, and able to spend quality time with each other. By allowing the women and men to have face to face contact with family and loved ones, they are sustaining a consistent, positive relationship to the outside world, and thus greatly improving their chances for success once they are released.

However, these individuals represent the minority as far as an inmate's ability to have frequent contact with family members. Most inmates, because they are often miles apart can only communicate by telephone or mail. As such, when the inmate's family must bear the burden of exorbitant collect call fees, it places another barrier to and strain on an already sensitive situation. The opportunity for other telephone companies to provide competing services to prison inmates is extremely important. The reduction in telephone costs that would result from competition would greatly facilitate inmates' abilities to rehabilitate themselves through positive and consistent communication with their families and loved ones.

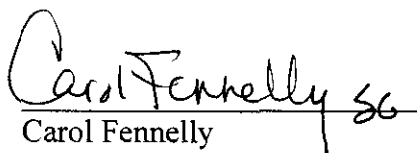
President George W. Bush addressed inmate reentry in his State of the Union address, bringing this issue to the national forefront. Our belief that we need to break down the barriers that prevent successful reentry into the community is consistent with his message. CCA's and other private prison firms' policies of only allowing one telephone company to provide collect calling services at exorbitant rates undermines the prevention of recidivism and inmates' chances for successful reentry into the community.

Our Place and Hope House are joined by The Journey Ahead Enterprises, Thoughts of the Spirit Ministry, Vistor's Services Center and Washington Legal Clinic for the Homeless, Inc., and fully support the Petition and request the Commission to implement a competitive inmate calling policy.

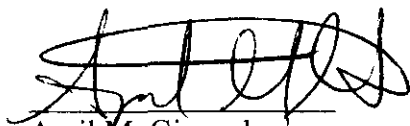
Respectfully submitted:



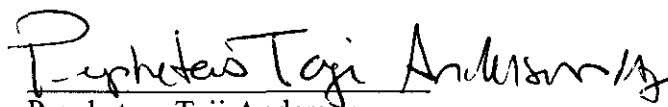
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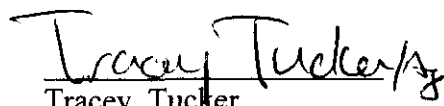


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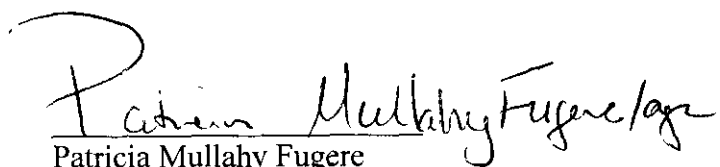
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A handwritten signature in black ink, reading "Patricia Mullahy Fugere". The signature is fluid and cursive, with a large initial "P" and a stylized "F".

Patricia Mullahy Fugere

Executive Director

Washington Legal Clinic for the Homeless Inc.

1200 U Street, NE

Washington, DC 20009

(202) 328-5500

March 8, 20004

CERTIFICATE OF SERVICE

I, April M. Giancola, hereby certify that on this 8th day of March, 2004, I did cause to be served by electronic mail and/or first class mail a copy of the foregoing "Comments of Our Place DC, Hope House and Other Supporting Organizations" on the following individuals.

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